

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

BRENDA L. LUCERO, HEATHER BARTON,)	
ILONA KOMPANIIETS and)	
CYNTHIA HURTADO, individually and on)	
behalf of all others similarly situated,)	
)	
Plaintiff,)	CIVIL ACTION NO.: 3:22-cv-00208-jdp
v.)	
)	
CREDIT UNION RETIREMENT PLAN)	
ASSOCIATION, THE BOARD OF DIRECTORS)	
OF THE CREDIT UNION RETIREMENT PLAN)	
ASSOCIATION, THE BOARD OF TRUSTEES)	
OF THE CREDIT UNION RETIREMENT PLAN)	
ASSOCIATION and JOHN DOES 1-30.)	
)	
Defendants.)	

PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

Plaintiffs, Brenda L. Lucero, Heather Barton, Ilona Kompaniets, and Cynthia Hurtado, (collectively, “Plaintiffs”), individually and on behalf of the Credit Union Retirement Plan Association 401(k) (the “Plan”), respectfully submit this Motion for Class Certification (the “Motion”) and hereby move this Court, pursuant to FED. R. CIV. P. 23, for an Order certifying this action (“Action”) as a class action, appointing Plaintiffs as representatives of the proposed class defined below (“Class”), and appointing Plaintiffs’ counsel as counsel for the Class (“Class Counsel”). For the reasons explained in the accompanying Memorandum of Law and other supporting papers, Plaintiffs respectfully submit that the Court should certify the following proposed Class:

All persons, except Defendants and their immediate family members, who were participants in or beneficiaries of the Credit Union Retirement Plan Association 401(k) Plan, at any time between April 12, 2016, through the date of judgment (the “Class Period”).

In addition, for the reasons stated in the accompanying Memorandum of Law and supporting papers, Plaintiffs also respectfully submit that they should be appointed as representatives of the proposed Class and that their attorneys should be appointed as Class Counsel.

Dated: July 14, 2023

Respectfully submitted,

CAPOZZI ADLER, P.C.

/S/ Mark K. Gyandoh

Mark K. Gyandoh (admitted *Pro Hac Vice*)
312 Old Lancaster Road
Merion Station, PA 19066
Telephone: (610) 890-0200
Facsimile: (717) 233-4103
Email: markg@capozziadler.com

CAPOZZI ADLER, P.C.

Donald R. Reavey (admitted *Pro Hac Vice*)
2933 North Front Street
Harrisburg, PA 17110
Telephone: (717) 233-4101
Facsimile: (717) 233-4103
Email: donr@capozziadler.com

Counsel for Plaintiffs and the Putative Class

CERTIFICATE OF SERVICE

I hereby certify that on July 14, 2023, a true and correct copy of the foregoing document was filed with the Court utilizing its ECF system, which will send notice of such filing to all counsel of record.

By: /s/Mark K. Gyandoh
Mark K. Gyandoh, Esq.